

## **REMARKS**

Claims 1-17 are pending in the application.

### **35 U.S.C. § 102 and § 103 Rejections:**

Claims 1 and 9 were rejected under 35 U.S.C. § 102(b) as being anticipated by Chi, U.S. Patent 5,940,870. Applicant respectfully traverses this rejection.

**The cited reference fails to teach or suggest all of the elements of the independent claims.** Chi teaches an address translation method for use in a system including a plurality of cluster nodes. The method includes, at a source node, receiving over a first network a communication with a first destination address having an index portion and an offset portion, wherein the index portion includes a partition number portion; providing an address mapping table which maps a plurality of indexes to a corresponding plurality of node ID's, each of the plurality of node ID's identifying a different one of the plurality of cluster nodes; using the index portion from the first destination address as an index into the address mapping table to identify a node ID, wherein the identified node ID identifies a destination node; appending the identified node ID to the first destination address to generate a second destination address; and using the second destination address to send information to a second network of the destination node.

In contrast, independent claim 1 recites, in pertinent part:

“wherein an active device included in a node of the plurality of nodes includes a memory management unit configured to receive a virtual address generated within that active device and to responsively output a global address identifying a coherency unit, wherein a portion of the global address identifies a translation function;

wherein a memory subsystem included in the node is configured to perform the translation function identified by the portion of the global address on an

additional portion of the global address in order to obtain a local physical address of the coherency unit

wherein each active device included in the node is configured to use the portion of the global address identifying the translation function when determining whether a local copy of the coherency unit is currently stored in a cache associated with that active device” (Emphasis added).

Independent claim 9 recites a similar combination of features.

Chi does not teach or suggest the combinations of features recited in either of the independent claims. More particularly, Chi fails to teach or suggest “an active device included in a node of the plurality of nodes that includes a memory management unit configured to receive a virtual address generated within that active device and to responsively output a global address identifying a coherency unit, wherein a portion of the global address identifies a translation function” and “wherein each active device included in the node is configured to use the portion of the global address identifying the translation function when determining whether a local copy of the coherency unit is currently stored in a cache associated with that active device”, in combination with the other features recited in claim 1, or similar combinations of features recited in claim 9.

In the office action, the Examiner contends that portion 110 of the global address shown in Fig. 8 of Chi identifies a translation function. Applicant respectfully disagrees, and notes that in regard to portion 110 of the global address, Chi states:

“The partition number 110 is the logical node ID within each application, such that there may be more than one application running on the system.” (Chi, Col. 5, lines 44-46; emphasis added).

Thus, portion 110 of the global address taught by Chi identifies a logical node. Applicant can find no teaching or suggestion anywhere in Chi wherein portion 110 of the global

address (or any portion of any address) identifies a translation function. Furthermore, applicant can find no teaching or suggestion in Chi of information identifying a translation function or performing a translation function identified by the portion of the global address as recited in combination with other features in claim 1. Accordingly, Applicant submits that Chi fails to anticipate the independent claims and therefore respectfully requests removal of the 35 U.S.C. § 102(b) rejection.

With respect to the 35 U.S.C. § 103(a) rejections, Applicant submits that the prior art teachings, taken singly or in combination with each other, fail to teach or suggest all of the elements of the claims. Accordingly, Applicant respectfully requests removal of the 35 U.S.C. § 103(a) rejections.

**Claim Objections and Allowable Subject Matter:**

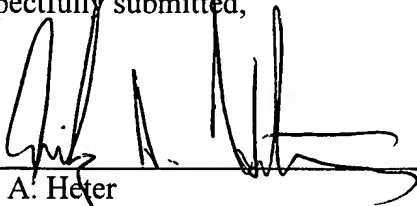
Claims 6, 11, 14, and 16-17 were objected to as being dependent on a rejected base claim, but would be allowable if rewritten in independent form to include all of the limitations of the base claim and any intervening claims. Applicant appreciates the Examiner's consideration of these claims.

## CONCLUSION

Applicant submits the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-01501/EAH.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Erik A. Heter', is written over a horizontal line.

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